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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

22 ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF DEFENDANT
GOOGLE LLC'S OPPOSITION TO
PLAINTIFFS' MOTION FOR PERMANENT
INJUNCTION AND DISGORGEMENT OF
PROFITS**

Dept: 3, 17th Fl.
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020
Trial Date: August 18, 2025

I, Eduardo E. Santacana, hereby declare as follows:

1. I am a partner with the law firm Cooley LLP and am counsel for Defendant Google LLC (“Google”) in the above captioned action. I am duly licensed to practice law in the State of California and am admitted to practice before this Court. The matters set forth herein are of my own personal knowledge, and if called as a witness to testify, I could and would testify to these matters. I submit this declaration in support of Google’s Opposition to Plaintiffs’ Motion for Permanent Injunction and Disgorgement of Profits filed concurrently herewith.

2. Attached hereto as **Exhibit H** is a true and correct copy of an excerpt of the transcript of the December 15, 2022 deposition of Belinda Langner in this action. The excerpt includes the cover page of Exhibit 181 marked during Ms. Langner's deposition, which indicates that the subject of her testimony was document GOOG-RDGZ-00184247, which was marked PX-419 at trial.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the forgoing is true and correct.

Executed on November 19, 2025, at San Francisco, California.

/s/ *Eduardo E. Santacana*

Eduardo E. Santacana